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Subject: Docket No. OPP-00550 (Food Safety)

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ATTACHMENT

Docket No. OPP-00550 (Food Safety Strategic Plan)

Comments for the overall format of the strategic plan-based on listening to Jan. 19th's meeting

The vision statement should reflect what the final outcome of the strategic plan is intended to do. The overall objective should be used to illustrate how the vision is to be accomplished. The goals then lead the reader through how the objective will be achieved. All of the above statements should be action-based sentences, since these statements will be used by staff and employees to make decisions.

As such, the vision statement and overarching goal should read as follows:

Vision: Protecting the public's health by providing safe, edible food to consumers - whether imported or exported, from the sea or farm, or from a restaurant or kitchen table. This is important because (e.g.) of 1) the acute and chronic illnesses and injuries that can result from unsafe food, 2) the new and emergent threats that are developing in the area of food safety and 3) due to the needs of vulnerable populations.

(This establishes the baseline to the very basic reader (such as a consumer) that the issue is food safety and why it is an important topic)

Overarching goal: Ensuring the continued production and consumption of safe food by significantly reduce the prevalence of foodborne hazards (unsafe food) through the use of 1) science and risk assessments, 2) risk management, and 3) risk communication. (at this point you can then define "risk") Such goals can be obtained through the coordination of federal/state/local/industry efforts, regulation, inspection/surveillance, enforcement, research, education and prevention programs.

This last sentence in the overarching goal sets up themes for objectives, which probably could be addressed in each goal. These objectives should be clearly identified and defined. For instance instead of numbering objectives, the objectives will be numbered by category.

Take for instance goal #1:

Goal #1: Science and Risk Assessment Goal (Since this is a goal it should not be stated as a fact, it should be formed as an action statement.) To provide a US food safety system that is based on sound science and risk assessment through the following objectives:

Objective 1: Regulation

Strengthen the scientific basis for food safety policies and regulatory decisions

Action items would then discuss how and what risk assessments would be used with what regulations to obtain goal #1

Objective 2: Inspection/Surveillance

Expanded surveillance and rigorous assessments of food products, including data collection capabilities for adverse human health outcomes.

Action items would then discuss the inspection and surveillance assessments that should be used to obtain goal #1.

. and so on

The other alternative is to make these objectives (i.e., education, coordination, regulation) the goals. Then under each goal, there will be the three objectives, which will include science and risk assessment, risk management, and risk communication. I would suggest that this would make more sense, as the most important message you would like to convey to the public are the themes of communication, and quality of education, regulation, inspection, etc. "Risk management" means nothing to a consumer. In fact, really, risk management is a means of achieving an overall goal of increasing the effectiveness of regulation or inspection. In addition, making the current objectives the goals will make the understanding and overall objective of food safety less complicated for all involved, as it should be.

*Please refer to the U.S. Department of Transportation's Strategic Plan for more illustrations of formatting and framework. I believe the US DOT's strategic plan is clear and concise, and most importantly easy to read and follow by the public as well as its own employees. (See www.dot.gov/hot/dotplan.html)

Thank you,
Danielle Bartoni
Evaluator, U.S. General Accounting Office

Please call if you have any further questions (202) 512-7217